

## **APPENDIX D**

### **Notification and Certification**

# FAIRFIELD PUBLIC SCHOOLS

APPENDIX D – Notification and Certification

State Project Number 051-08126 EA/EC

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December 20, 2013

Ms. Kimberly N. Tisa  
Region 1 PCB Administrator  
United States Environmental Protection Agency  
1 Congress Street, Suite 1100 (CPT)  
Boston, MA 02114-2023

Via Mail

Re: Notification and Certification Pursuant to 40 CFR 761.61(a)(3)(i)(E)  
Self-Implementing Clean Up Plan for  
Osborn Hill Elementary School  
760 Stillson Avenue  
Fairfield, CT

Dear Ms. Tisa:

Attached is a copy of the remedial plan developed to address PCB-containing building materials at Osborn Hill Elementary School for review by EPA. Implementation of this plan will allow for the safe removal and proper disposal of PCB-containing materials prior to the renovation of structures located at the site. This letter and the attached remedial plan constitute the notification required to federal authorities at least 30 days prior to the date of initiating remediation under 761.61(a)(3)(i). Work will not commence without having received approval from the EPA. This letter and attached remedial plan will also be forwarded to state officials at the Connecticut Department of Energy and Environmental Protection, and local officials with the Town of Fairfield to satisfy requirements for notification of state and local officials.

This certification is to accompany the Self-Implementing Cleanup Plan for the removal and abatement of building materials and soil remediation work to be performed prior to and during renovation of the windows and doors throughout the building. The project includes the abatement of materials that contain PCBs greater than 50 PPMs which is federally regulated. The project also includes the abatement of materials that contain PCBs less than 50 PPM, therefore is regulated by the State of Connecticut DEEP. This letter serves the notification to EPA as well as the DEEP for PCB materials regulated by each agency. We have listed the CT Regulated PCB materials within the remediation Plan. The contract for this work shall be administered by the Fairfield Public Schools; however, the site is owned by the Town of Fairfield. AMC Environmental, LLC has prepared this plan under the provisions specified in 761.61(c) and 761.61(a) for remedial work to be performed at the site. The scope of work for this project includes all

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of the windows and doors in the classrooms as well as the offices. The windows in classrooms 107 and 108 and in the Library/Media Center are excluded from this project.

These windows were part of the 1997 addition to the building. However, the caulking for these windows were tested and documented to be greater than 1.0 PPM but below 50 PPM. It is unclear why PCBs exist in these materials but the presence of PCBs were documented on several samples. These windows will be addressed in a future renovation. Representative samples have been obtained from the window and door systems throughout the entire school except for the portable units. The building also had a ceiling and lighting replacement project throughout the entire school in 1996. Therefore, PCB ballast should not exist within the building. This notification includes all of the areas of the building that PCBs were documented except for the Gym and hallways that are covered in a separate notification.

Since the discovery of EPA Regulated PCBs, AMC Environmental, LLC has conducted quarterly air and wipe sampling for PCBs beginning in November 2012. Each quarterly testing includes airborne PCB sampling in approximately 10-12 areas of the school and wipe testing includes approximately 20 surfaces including books, walls, desk and floors throughout the school. All four quarterly inspections conducted throughout a calendar year will cover each room throughout the school. The results of the November 2012, February 2013 and May 2013 were all documented to be in compliance with EPA's recommended thresholds. However, the results of two air samples (Library and Custodians office/closet) from the August 2013 quarterly inspection documented elevated levels of airborne PCBs for the age of the children occupying the school. Upon receipt of these results, AMC notified the Fairfield BOE and USEPA and the following response action was developed: The resealing of any possible openings between the Gym and the Library as well as putting the Gym under negative pressure (with HEPA equipped air filtration machines). HEPA equipped air filtration machines were also set up and allowed to run in the Library for approximately four (4) days. Upon turning off the filtration machines, the air within the affected areas was allowed to settle for seven (7) days, followed by retesting of the affected areas. The results of the follow-up testing documented acceptable levels of airborne PCBs below 300 ng/m<sup>3</sup>, the recommended level for children between 6 and 12 years of age.

As a result of the discovery of EPA regulated PCBs elevated surface and airborne PCBs, clean up and duct cleaning was performed in August 2012. The duct cleaning involved areas of the Library, hallway outside library, boy's and girl's toilet rooms and adjacent hallways. The duct cleaning included systems EF-11, EF-7, CUH-6, RTU-1, CUH-5 and EF-15.

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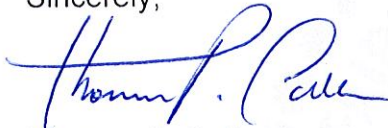
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Certification Pursuant to 40 CFR 761.61(a)(3)(i)(E)

I certify that all sampling plans, sample collection procedures, sample preparation procedures, extraction procedures, and instrumental/chemical analysis procedures used to access or characterize the PCB contamination at the cleanup site are on file at the offices of AMC Environmental, LLC located at 622 Clinton Avenue, Bridgeport, CT and are available for EPA inspection.

If you have any questions you may contact Tom Cullen at 203-255-8235 or via email at [tcullen@fairfield.k12.ct.us](mailto:tcullen@fairfield.k12.ct.us).

Sincerely,



Thomas P. Cullen

cc: Gary Trombly, CT DEEP